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VIA E-FILE AND HAND DELIVERY

The Honorable Joseph J. Farnan, Jr. United States District Court District of Delaware 844 King Street Wilmington, DE 19801

Re:

Trial Time for Defendants

L.G. Philips LCD Co. Ltd. v. Tatung Company et. al.,

C.A. No. 05-292 (JJF)

Dear Judge Farnan:

During the pre-trial conference on July 7, 2006, the Court indicated that a trial management order, allocating time for presentation of evidence at trial, would be entered on or about July 12, 2006. Defendants respectfully submit the following information relating to the anticipated proofs at trial and the amount of time that defendants believe will be necessary.

Defendants understand that the trial time allotted by the Court will be tight. Defendants are prepared to put on an efficient case. To help inform the Court as to what defendants believe is the amount of time for each of them to put on their cases, the following is proposed.

Defendants have two expert witnesses that will be examined at trial. Defendants believe that at least four to four and a half hours will be required for direct and re-direct examination on the issues of invalidity and non-infringement, and about one to one and a half hours for the direct and re-direct examination of their damages expert.

The four Defendants also will have a total of nine fact witnesses that will testify live. All but one of the fact witnesses will be testifying in Chinese. Given the time for translation, defendants believe that they will require on average two to two and a half hours for direct and redirect examination per fact witness due to the time taken for translation. In our experience, working through interpreters will essentially double the time required for the examination since every questions and answer must be repeated through the translation process.

Defendants also anticipate presenting one witness by video for approximately one hour

Although Defendants do not know who will be on Plaintiff's final witness list, Defendants anticipate that approximately five and a half hours of cross-examination time is reasonable. Defendants also anticipate that they will need approximately three hours of time for a rebuttal case on invalidity, plus three and a half hours total to conduct opening and closing arguments.

| Witness | Time (Hours) | Running Total |
|----------------------|--------------|---------------|
| Expert Witnesses (2) | 6.0 | 6.0 |
| Fact Witnesses (9) | 20.0 | 26.0 |
| Video | 1.0 | 27.0 |
| Opening & Closing | 3.5 | 30.5 |
| Cross-Examination | 5.5 | 36.0 |
| Rebuttal | 3.0 | 39.0 |

Although defendants cannot predict at this point exactly how much time each part will take, Defendants believe that the 39 hours of time will permit each of the four defendants to put on a fair defense to Plaintiff's allegations.

Defendants' recognize that the proposed time allocation exceeds that for a typical patent trial in this District. We respectfully submit that, in light of the translation issues on both sides of the case, the allocations proposed above are reasonable for this case - and will still serve the purpose of focusing and streamlining the presentations to the jury.

Robert W. Whetzel

RWW/lmg

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